

FILED

NOV 5 2020

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BILLY THOMAS,

Defendant.

4:20CR708 CDP/PLC

**INDICTMENT**

The Grand Jury charges that:

**COUNT I**

On or about May 26, 2020, within the Eastern District of Missouri, the defendant,

**BILLY THOMAS,**

did knowingly and willfully transmit in interstate commerce, a communication, in the form of an email, to N.H., an employee of the Social Security Administration, and the communication contained a threat to injure N.H., specifically, to blow up the Social Security field office with N.H. in the building.

In violation of Title 18, United States Code, Section 875(c).

**COUNT II**

On or about May 26, 2020, within the Eastern District of Missouri, the defendant,

**BILLY THOMAS,**

did knowingly transfer, possess, or use, in or affecting interstate or foreign commerce, without lawful authority, a means of identification of another person, to wit: the Missouri-issued driver's license of A.L., knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of

Federal law and a felony under an applicable State law, to wit, communicating an interstate threat in violation of 18 U.S.C. § 875(c).

In violation of Title 18, United States Code, Section 1028(a)(7).

**COUNT III**

On or about May 26, 2020, within the Eastern District of Missouri, the defendant,

**BILLY THOMAS,**

did use threats of force to attempt to intimidate and impede a Social Security Claims Representative who was acting in an official capacity to carry out a duty under the Social Security Act.

In violation of Title 42, United States Code, Section 1320a-8b.

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN,  
United States Attorney

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Special Assistant United States Attorney